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August 26, 2014

VIA EMAIL AND FEDERAL EXPRESS

David Hoefer
Office of Regional Counsel
U.S. EPA Region 7
11201 Renner Boulevard
Mail Code: CNSLSPFD
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Daniel R. Gravatt, PG
US EPA Region 7 SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

Re: West Lake Landfill Site – Information Concerning Proposed Isolation Barrier

Messrs. Hoefer and Gravatt:

We represent Cotter Corporation (“Cotter”), one of the potentially responsible parties identified by EPA for the West Lake Landfill Superfund Site (the “Site”). We write to bring to your attention important, newly identified information concerning the Site.

In the course of reviewing historic aerial photographs of the Site, we have identified what appears to be an earthen barrier, or dike, across the “neck” area between the North and South Quarry of the Bridgeton Landfill – located precisely in the area recommended by the Missouri Department of Natural Resource’s landfill expert for a vertical barrier to segregate the Subsurface Smoldering Event (“SSE”) in the South Quarry from reaching the North Quarry. Based on the limited information available to us, we estimate the dimensions of this earthen dike to be approximately 600 feet long, 50 feet wide at its deepest visible point, 20 feet tall, and six feet wide at its crest. Based upon these dimensions and slight observed variations along its length, it appears that the dike was constructed with side slopes varying between 1.1 and 1.3 feet horizontal for each foot vertical. EMSI was apparently unaware of the existence of this barrier when they submitted their January 14, 2014 report to EPA entitled “Evaluation of Possible Impacts of a Potential Subsurface Smoldering Event.”

We believe this is important, new information that needs to be taken into account in EPA’s and Army Corps of Engineers’ evaluation of the proposed isolation barrier. At the very least, the

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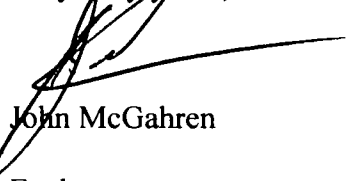
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existence, size, and location of this earthen barrier needs to be evaluated. If our estimates are correct, the very presence of this earthen dike constitutes a physical barrier of a similar size and nature to the isolation barrier currently being contemplated for design and construction in the coming months. In addition to other current information on the SSE, this new information calls into question whether there is even the need for a "new" isolation barrier at all.

We have enclosed three-dimensional copies of three publically available aerial photos that show the location, configuration and dimensions of the portions of the (then-) visible portion of the dike, dated 3/1/96, 4/16/96 and 5/19/96, respectively, for your use and reference, along with 3-D glasses, which are helpful to view site features in the photos. Each aerial photo identifies the photo source and date; and all three are available in full stereo coverage from those sources.

Thank you for your consideration of this new, important information.

Very truly yours,



John McGahren

Enclosures

cc: William Beck, Esq., Lathrop & Gage LLP
Dale A. Guariglia, Esq., Bryan Cave LLP
Jessie Merrigan, Esq. Lathrop & Gage LLP
Paul Rosasco, P.E., EMSI
Victoria Warren, Republic Services
Kathleen Whitby, Spencer Fane Britt & Browne LLP

U.S. EPA Region 7

Lynn M Slugantz

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original 3D photographs
(3) and copy of
letter and 3D glasses
mailed to Aaron
Schmidt Moore, on
Sept 26, 2014.

Records

Ctr

Bred - this is a
duplicate I think
of something already
in the file - can
you check?

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